

PAUL HASTINGS LLP  
Luc A. Despins, Esq.  
G. Alexander Bongartz, Esq.  
Avram E. Luft, Esq.  
200 Park Avenue  
New York, New York 10166  
(212) 318-6079

*Counsel for the Chapter 11 Trustee for  
Estate of Ho Wan Kwok*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
	:	
In re:	:	Chapter 11
	:	
GENEVER HOLDINGS LLC,	:	Case No. 20-12411 (JLG)
	:	
Debtor.	:	
	:	
-----X	:	

**NOTICE OF APPEARANCE OF CHAPTER 11 TRUSTEE FOR ESTATE OF HO WAN  
KWOK, SOLELY FOR PURPOSES OF VENUE TRANSFER MOTION**

**PLEASE TAKE NOTICE** that Paul Hastings LLP by and through the undersigned, hereby makes an appearance on behalf of Luc A. Despins, in his capacity as trustee (the “Chapter 11 Trustee”) for the estate of Ho Wan Kwok in the chapter 11 case *In re Ho Wan Kwok*, No. 22-50073 (JAM) (Bankr. D. Conn.), a party-in-interest in the above-captioned bankruptcy proceedings (the “Bankruptcy Case”), solely for purposes of the motion (the “Venue Transfer Motion”) by the Debtor and the Chapter 11 Trustee requesting transfer of venue of this case to the United States Bankruptcy Court for the District of Connecticut. Paul Hastings requests, pursuant to Rules 2002, 9007, and 9019 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. § 1109(b), that all notices given or required to be given in the Bankruptcy Case, and that

all pleadings, orders and other papers served or required to be served in the Bankruptcy Case, in each case to the extent related to the Venue Transfer Motion, be given and served upon:

Luc A. Despins, Esq.  
G. Alexander Bongartz, Esq.  
Avram E. Luft, Esq.  
PAUL HASTINGS LLP  
200 Park Avenue  
New York, New York 10166  
(212) 318-6079  
Email: lucdespins@paulhastings.com  
alexbongartz@paulhastings.com  
aviluft@paulhastings.com

**PLEASE TAKE FURTHER NOTICE** that under section 1109(b) of the Bankruptcy Code, this request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, telegraph, telex, e-mail or otherwise filed or made with regard to the above-captioned case and proceedings, in each case to the extent related to the Transfer Venue Motion.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the Chapter 11 Trustee's: (i) right to have final orders in noncore matters entered only after de novo review by a district court judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which the Chapter 11

Trustee is or may be entitled under any agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: New York, New York  
September 30, 2022

By: /s/ Luc. A. Despins  
Luc A. Despins, Esq.  
G. Alexander Bongartz, Esq.  
Avram E. Luft, Esq.  
PAUL HASTINGS LLP  
200 Park Avenue  
New York, New York 10166  
(212) 318-6079

*Counsel for the Chapter 11 Trustee for  
Estate of Ho Wan Kwok*